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SOUTHERN DISTRICT OF CALIFORNIA

BY *[Signature]*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

'08 CR 1165 JM

UNITED STATES OF AMERICA,) Criminal Case No.
))
Plaintiff,) I N D I C T M E N T
))
v.) Title 8, U.S.C.,
ROBERTO TORRES-HERNANDEZ (1),) Sec. 1324(a)(2)(B)(ii) -
aka Gregorio Cruz-Merino,) Bringing in Illegal Aliens for
MIGUEL MERINO-CALVERO (2),) Financial Gain; Title 18, U.S.C.,
) Sec. 2 - Aiding and Abetting;
Defendants.) Title 8, U.S.C.,
) Secs. 1324(a)(1)(A)(ii) and
) (v)(II) - Transportation of
) Illegal Aliens and Aiding
) and Abetting

The grand jury charges:

Count 1

On or about March 27, 2008, within the Southern District of California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-Merino and MIGUEL MERINO-CALVERO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Agustin Cavero-Ortiz, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

2 On or about March 27, 2008, within the Southern District of
3 California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-
4 Merino and MIGUEL MERINO-CALVERO, with the intent to violate the
5 immigration laws of the United States, knowing and in reckless
6 disregard of the fact that an alien, namely, Agustin Cavero-Ortiz, had
7 come to, entered and remained in the United States in violation of
8 law, did transport and move said alien within the United States
9 in furtherance of such violation of law; in violation of Title 8,
10 United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 3

12 On or about March 27, 2008, within the Southern District of
13 California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-
14 Merino and MIGUEL MERINO-CALVERO, with the intent to violate the
15 immigration laws of the United States, knowing and in reckless
16 disregard of the fact that an alien, namely, Donaciano Ramirez-Merino,
17 had not received prior official authorization to come to, enter and
18 reside in the United States, did bring to the United States said alien
19 for the purpose of commercial advantage and private financial gain;
20 in violation of Title 8, United States Code,
21 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
22 Section 2.

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Count 4

2 On or about March 27, 2008, within the Southern District of
3 California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-
4 Merino and MIGUEL MERINO-CALVERO, with the intent to violate the
5 immigration laws of the United States knowing and in reckless
6 disregard of the fact that an alien, namely, Donaciano Ramirez-Merino,
7 had come to, entered and remained in the United States in violation
8 of law, did transport and move said alien within the United States
9 in furtherance of such violation of law; in violation of Title 8,
10 United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 5

12 On or about March 27, 2008, within the Southern District of
13 California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-
14 Merino and MIGUEL MERINO-CALVERO, with the intent to violate the
15 immigration laws of the United States, knowing and in reckless
16 disregard of the fact that an alien, namely, Silverino Ramirez-Mejia,
17 had not received prior official authorization to come to, enter and
18 reside in the United States, did bring to the United States said alien
19 for the purpose of commercial advantage and private financial gain;
20 in violation of Title 8, United States Code,
21 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
22 Section 2.

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Count 6

2 On or about March 27, 2008, within the Southern District of
3 California, defendants ROBERTO TORRES-HERNANDEZ, aka Gregorio Cruz-
4 Merino and MIGUEL MERINO-CALVERO, with the intent to violate the
5 immigration laws of the United States knowing and in reckless
6 disregard of the fact that an alien, namely, Silverino Ramirez-Mejia,
7 had come to, entered and remained in the United States in violation
8 of law, did transport and move said alien within the United States
9 in furtherance of such violation of law; in violation of Title 8,
10 United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

11 DATED: April 15, 2008.

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A TRUE BILL:

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15 KAREN P. HEWITT
16 United States Attorney

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18 By: J. Moore

19 JEFFREY D. MOORE
Assistant U.S. Attorney

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Foreperson